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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN MAYORGA,
Plaintiff,

Case No. 2:19-cv-00168-JAD-DJA

vs.

CRISTIANO RONALDO,
Defendant.

**STIPULATION TO EXTEND TIME FOR DEFENDANT’S REPLY IN SUPPORT
OF MOTION FOR ATTORNEY’S FEES AND FOR DEFENDANT’S RESPONSE TO
PLAINTIFF’S OBJECTION TO DEFENDANT’S BILL OF COSTS AND OPPOSITION
TO MOTION FOR PRODUCTION OF RETAINER AGREEMENT AND DEFENSE
COUNSEL’S STATEMENT OF ACCOUNT**

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN Plaintiff
KATHRYN MAYORGA by and through her attorney LESLIE MARK STOVALL, ESQ. and
Defendant, CRISTIANO RONALDO, by and through his attorneys PETER S. CHRISTIANSEN,
ESQ., and KENDELEE L. WORKS, ESQ., that the time for Defendant’s Opposition to ECF No.
208, Response to ECF No. 207 and Reply to ECF No. 206, be collectively extended to August
27, 2022.

More specifically, Defendant filed and served his Motion for Attorney’s Fees and Costs
on June 24, 2022. ECF No. 198. On July 8, 2022, Plaintiff filed a Motion for Enlargement of
Time for Plaintiff’s Filing of Response to Defendant’s Motion for Attorney’s Fees. ECF No. 202.





On August 8, 2022, Plaintiff filed a Second Motion for Enlargement of Time for Plaintiff's Filing of Response to Defendant's Motion for Attorney's Fees. ECF No. 205. On August 10, 2022, Plaintiff filed a Motion for Production of Retainer Agreement and Defense Counsel's Statement of Account, the opposition to which is currently due August 24, 2022. ECF No. 208. On August 10, 2022, Plaintiffs also filed her Objection to Defendant's Bill of Costs, making any response due August 17, 2022. ECF No. 207. Plaintiff also filed under seal, her Opposition to Motion for Attorney's Fees (ECF No. 260) on August 10, 2022, but did not serve the Opposition until August 11, 2022, thereby making the Reply thereto due on or before August 18, 2022. ECF No. 260. Plaintiff also filed under seal, an Errata and Errata Plaintiff's Index of Exhibits and Exhibits, which is dated August 11, 2022, but was not served on Defendant's counsel until August 16, 2022, making any response deadline unclear. (The Errata references ECF No. 260, but that is believed to be a clerical error and the Errata in fact, pertains to ECF No. 206, which was filed under seal). Based on the commonality of issues amongst these filings, the varying service dates and the combined hearing, deposition and travel schedule of Defense Counsel, Plaintiff and Defendant agree to extend the time for filing all of the foregoing replies, responses and oppositions to August 27, 2022.

Good cause exists to extend the instant deadlines in order to allow Defendant's Counsel to meaningfully respond to the lengthy arguments outlined in the subject filings and also confirm the status of filings made under seal and erratas thereto. The subject request for extension and stipulation are brought in good faith and not for the purpose of delay.

Respectfully Submitted this 17th day of August, 2022.

CHRISTIANSEN TRIAL LAWYERS

STOVALL & ASSOCIATES

/s/ Peter S. Christiansen, Esq.

/s/ Leslie M. Stovall, Esq.

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KENDELEE L. WORKS, ESQ. (#9611)

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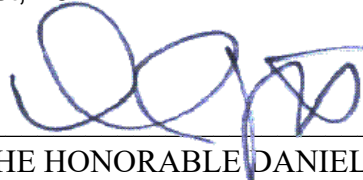
Attorneys for Plaintiff Kathryn Mayorga

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ORDER


IT IS HEREBY ORDERED that Defendant's Opposition to ECF No. 208, Response to ECF No. 207 and Reply to ECF No. 206, be collectively extended to August 27, 2022.

DATED this 18th day of August, 2022.



THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE



From: Les Stovall les@lesstovall.com 
Subject: Re: CR- Draft stip to extend
Date: August 17, 2022 at 4:04 PM
To: Kendelea Works kworks@christiansenlaw.com
Cc: Keely Perdue keely@christiansenlaw.com, Belin Zeleke belin@lesstovall.com, imee@lesstovall.com

You are authorized to use my esignature and file stop with court

Sent from my iPad

On Aug 17, 2022, at 3:59 PM, Kendelea Works <kworks@christiansenlaw.com> wrote:

Les,

Please let us know if we have permission to file the attached using your electronic signature.

Thanks,
Kendelea



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TO EX...v.docx